

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SECURITIES)	
AND EXCHANGE COMMISSION,)	
)	
Plaintiff,)	Case No. 13-CV-982
)	
v.)	Judge Amy J. St. Eve
)	
A CHICAGO CONVENTION CENTER, LLC,)	
ANSHOO R. SETHI, and)	
INTERCONTINENTAL REGIONAL CENTER)	
TRUST OF CHICAGO, LLC)	
)	
Defendants.)	

**DEFENDANTS A CHICAGO CONVENTION CENTER, LLC, ANSHOO SETHI, AND
INTERCONTINENTAL REGIONAL CENTER TRUST OF CHICAGO, LLC’S
MOTION TO JOIN IN PLAINTIFF SEC’S MOTION TO MODIFY THE ASSET
FREEZE ORDER TO RETURN ESCROWED FUNDS TO INVESTORS**

Defendants A Chicago Convention Center, LLC, Anshoo Sethi, and Intercontinental Regional Center Trust of Chicago, LLC (“Defendants”) respectfully request to join in Plaintiff’s Motion to Modify the Court’s Asset Freeze Order to Direct the Escrow Agent, SunTrust Bank, to Return Escrowed Funds to Investors (Dkt. No. 53). In support of their motion, Defendants state as follows:

1. On February 20, 2013, the Court entered an Asset Freeze Order. (Dkt. 27.)
2. From the initial hearing before this honorable Court at the onset of this action, Defendants have consistently and repeatedly taken the position that the escrowed investor funds should be returned to investors as quickly and efficiently as possible.
3. On March 28, 2013, the SEC filed a Motion to Modify the Court’s Asset Freeze Order to Direct the Escrow Agent, SunTrust Bank, to Return Escrowed Funds to Investors. (Dkt. 53.)

4. Defendants seek the Court's permission to join in Plaintiff's Motion to Modify the Asset Freeze Order to continue to pursue the return of escrow funds to the investors.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their Motion to Join the Plaintiff's Motion to Modify the Asset Freeze Order and grant them such other and further relief as this Court deems just and proper.

Respectfully submitted,

A CHICAGO CONVENTION CENTER,
LLC, ANSHOO SETHI, and
INTERCONTINENTAL REGIONAL
CENTER TRUST OF CHICAGO, LLC

Dated: April 16, 2013

/s/ Scott Mendeloff

One of Their Attorneys

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